

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C.**

In the Matter of:)	
)	CC Docket No. 94-102
Revision of the Commission's Rules)	
To Ensure Compatibility with)	SRCL Holding Company, Inc.
Enhanced 911 Emergency Calling Systems)	TRS No. 808356

**CARRIER REPORT ON IMPLEMENTATION OF
WIRELESS E911 PHASE II
AUTOMATIC LOCATION IDENTIFICATION**

SRCL Holding Company, Inc. dba StarCellular, hereinafter "StarCellular", hereby submits its report on implementation of wireless Enhanced 911 (E911) Phase II automatic location identification ("ALI") in response to the Commission's Public Notice, *Wireless Telecommunications Bureau Provides Guidance on Carrier Reports on Implementation of Wireless E911 Phase II Automatic Location Identification*, DA 00-2099, released September 14, 2000.

Background/Contact Information

(1) Carrier Identifying Information:

SRCL Holding Company, Inc. dba StarCellular
TRS No. 808356

(2) Contact Information:

The person responsible for this StarCellular carrier report is Adelbert L. Joy, General Manager; SRCL Holding Company, Inc. dba StarCellular; 323 North Street, Saco, Maine 04072; (207) 283-8001; FAX (207) 282-7406. Mr. Joy's e-mail address is ajoy@starcellular.com.

E911 Phase II Location Technology Information

(1) Type of Technology:

StarCellular has not been able to make an election as to the type of technology that it would deploy across its service territory.¹ StarCellular has not received a response from any handset vendors it has contacted to determine when E911 Phase II compliant handsets might be available.² Moreover, control of StarCellular will be transferred to an unaffiliated third party prior to the time that E911 Phase II technology will be implemented. The Commission has approved the transfer of control of StarCellular to TLA Spectrum, LLC (“TLA”), a subsidiary of Rural Cellular Corporation. *See* Public Notice, DA 00-2442, *released* October 31, 2000. The closing of the transaction underlying the approved transfer is scheduled for early January 2001. Because of the limitations in the agreement between the shareholders of StarCellular and TLA, TLA has not formally disclosed to StarCellular what type of technology it intends to deploy in StarCellular’s service territory. Contact information for TLA is: Richard Ekstrand, President & CEO, TLA Spectrum, LLC, P.O. Box 2000, Alexandria, Minnesota 56308; (320) 762-2000; FA (320) 808-2102. Additional information about TLA can be found in the application to transfer control of StarCellular to TLA, File No. 0000186145. After the closing of the transfer of control of StarCellular to TLA in January 2001, it will be the responsibility of TLA to submit updated reports on its implementation plan for StarCellular’s service territory. *See E911 Third Report and Order*, 14 FCC Rcd. 17428 (1999) at ¶ 89.

¹ StarCellular’s predominantly rural service territory is Portsmouth-Dover-Rochester, NH/ME.

² StarCellular received some information from Lucent regarding a hybrid solution for E911 Phase II ALI.

(2) Testing and Verification:

StarCellular has not developed a testing method to determine the accuracy of the ALI solution selected because it has been unable to elect a technology for E911 Phase II. *See* Item 1 above.

(3) Implementation Details and Schedule:

StarCellular anticipates that hardware and/or software changes will be necessary depending upon the technology TLA ultimately selects for StarCellular's service territory, but StarCellular has no information regarding these potential changes. *See* Item 1 above.

(4) PSAP Interface:

StarCellular has no information regarding the hardware and/or software changes necessary to transmit Phase II data to PSAPs or of TLA's strategy and scheduling for the installation and/or modification of such hardware or software changes. *See* Item 1 above.

(5) Existing Handsets:

StarCellular has no information regarding TLA's strategy and schedule for the upgrade and/or replacement of existing customer handsets, if applicable to TLA's technology selection. *See* Item 1 above.

(6) Location of Non-Compatible Handsets:

StarCellular has no information regarding the efforts of TLA to accommodate handsets that are incompatible with its ALI system, if TLA opts for a handset-based or hybrid E911 Phase II system for StarCellular's service territory. *See* Item 1 above.

(7) Other Information:

As of the date of this report, StarCellular has not received any Phase II requests from PSAPs.

Respectfully submitted,

_____/s/
Adelbert L. Joy
General Manager
SRCL Holding Company, Inc. dba StarCellular

Dated: November 8, 2000